

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

ELIZABETH SINES, SETH WISPELWEY,
MARISSA BLAIR, APRIL MUNIZ, MARCUS
MARTIN, NATALIE ROMERO, CHELSEA
ALVARADO, THOMAS BAKER and JOHN
DOE,

Plaintiffs,

v.

JASON KESSLER, RICHARD SPENCER,
CHRISTOPHER CANTWELL, JAMES
ALEX FIELDS, JR., VANGUARD
AMERICA, ANDREW ANGLIN,
MOONBASE HOLDINGS, LLC, ROBERT
“AZZMADOR” RAY, NATHAN DAMIGO,
ELLIOT KLINE a/k/a ELI MOSELY,
IDENTITY EVROPA, MATTHEW
HEIMBACH, MATTHEW PARROTT a/k/a
DAVID MATTHEW PARROTT,
TRADITIONALIST WORKER PARTY,
MICHAEL HILL, MICHAEL TUBBS, LEAGUE
OF THE SOUTH, JEFF SCHOEPP, NATIONAL
SOCIALIST MOVEMENT, NATIONALIST
FRONT, AUGUSTUS SOL INVICTUS,
FRATERNAL ORDER OF THE ALT-
KNIGHTS, LOYAL WHITE KNIGHTS OF THE
KU KLUX KLAN, and EAST COAST
KNIGHTS OF THE KU KLUX KLAN a/k/a
EAST COAST KNIGHTS OF THE TRUE
INVISIBLE EMPIRE,

Defendants.

Civil Action No. 3: 17-cv-00072-NKM

MOTION FOR PRO HAC VICE ADMISSION OF ALEXANDRA K. CONLON

Pursuant to Rule 6(d) of the Local Rules for the United States District Court for the

Western District of Virginia, I, Robert T. Cahill, an attorney admitted to practice in this Court,

and counsel of record in the instant proceeding, hereby moves the Court for the admission of Alexandra K. Conlon, Esq. to appear *pro hac vice* on behalf of the Plaintiffs in the above captioned case and in support thereof state as follows:

1. Ms. Conlon is an attorney with Kaplan Hecker & Fink LLP, 350 Fifth Avenue, Suite 7110, New York, NY 10118, Tel: (212) 763-0883, Email: aconlon@kaplanhecker.com.
2. Ms. Conlon is qualified and licensed to practice law and is a bar member in good standing in the State of New York (Registration No. 5331855 – Date of Admission: Mar. 2, 2015) and the Commonwealth of Massachusetts (Registration No. 692355 – Date of Admission: Nov. 19, 2014). She is also a bar member in good standing with the United States District Court for the Southern District of New York (Date of Admission: Nov. 19, 2019).
3. Ms. Conlon agrees to submit to and comply with the appropriate rules of procedure as required in the case for which she is applying to appear *pro hac vice* as well as the rules and standards of professional conduct applicable to all lawyers admitted to practice before this Court.

WHEREFORE, for the reasons stated above, it is requested that this Court grant this motion and permit Alexandra K. Conlon, Esq. to appear *pro hac vice* on behalf of Plaintiffs in the above captioned case, and to appear at hearings or trials in the absence of an associated member of the bar of this Court.

Dated: April 8, 2020

Respectfully submitted,

/s/ Robert T. Cahill

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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on April 8, 2020, I filed the foregoing with the Clerk of Court through the CM/ECF system, which will send a notice of electronic filing to:

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I further hereby certify that on April 8, 2020, I also served the following non-ECF participants, via electronic mail, as follows:

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s/ Robert T. Cahill

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